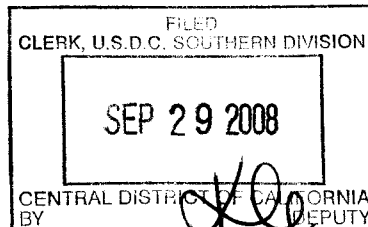


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Attorneys for Plaintiff
 UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

UNITED STATES OF AMERICA,) No. SA CR 08-223
)
 Plaintiff,) GOVERNMENT'S EX PARTE
) APPLICATION FOR ORDER
 v.) UNSEALING INDICTMENT AS TO
) DEFENDANT JASON I. MING WEI
) ONLY AND RESEALING AS TO THE
 JERRY FANYUAN LIN,) REMAINING DEFENDANTS;
 JASON I. MING WEI,) DECLARATION OF TERRI K. FLYNN
 REN SUI,)
 a.k.a. "Jeffrey,")
 ERIK DAMIEN VICENTE,) [UNDER SEAL]
 JOSE G. GARIBAY,)
 a.k.a. "Guero,")
 SHANE KELTER,)
 ADRIAN GARCIA DE ALBA,)
 a.k.a. "Pedro,")
 JAGMOHAN S. DHILLON,)
 PARAMIJT SINGH,)
 a.k.a. "Pumma,")
 WALTHER EDGARDO ORELLANA)
 AGUILAR,)
 a.k.a. "Sharky,")
 FAUSTO VILLA PEREZ,)
 MING CHIEN HSIEH,)
 a.k.a. "Sonny,")
 HONG YEE CHOW,)
 a.k.a. "Annie,")
 MARCO ANTONIO SILVA MOTA,)
 ALEXANDER CHIANG POU,)
 a.k.a. "Alex,")

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2 NATHANAEL GARRARD LINEHAM,)
3 a.k.a. "Nat,")
4 MICHELLE ENCK,)
5 Defendants.)
6

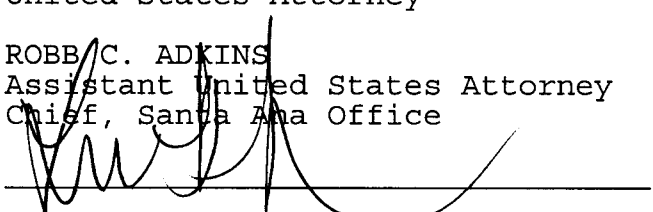
7 The United States of America hereby applies to this Court
8 for an order unsealing the indictment in the above-captioned
9 proceedings for defendant Jason I. Ming Wei and his counsel only.
10 The government further requests that the indictment be resealed
11 as to the remaining defendants who have not yet been arrested
12 until such time as the government notifies the Court that the
13 indictment should be unsealed. In support of this application,
14 the government submits the attached Declaration of Terri K.
15 Flynn.

16 DATED: September 29, 2008

Respectfully submitted,

17 THOMAS P. O'BRIEN
18 United States Attorney

19 ROBB C. ADKINS
20 Assistant United States Attorney
21 Chief, Santa Ana Office

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TERRI K. FLYNN
Assistant United States Attorney

DECLARATION OF TERRI K. FLYNN

I, Terri K. Flynn, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. Jerry Fanyuan Lin, et al., SA CR 08-223.

2. On September 28, 2008, defendant Jason I. Ming WEI was arrested at the Los Angeles International Airport as he was preparing to board a flight out of the country. Because he is now in custody, the government seeks to unseal the indictment as to defendant WEI and his counsel only.

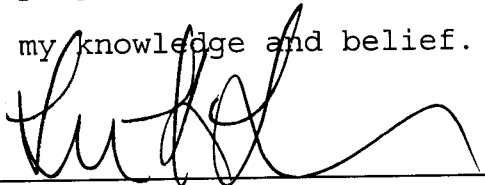
3. The remaining defendants charged in the above-captioned indictment have not been taken into custody on the charges contained in the indictment and have not been informed that they are being named as defendants in the indictment. The likelihood of apprehending one or more of the charged defendants might be jeopardized if the indictment in this case was made publicly available before the defendants are taken into custody on the indictment.

4. The government is preparing to arrest the remaining defendants on September 30, 2008. Disclosure of the indictment to the public a day before the arrest date may cause defendants to flee if they learn of the indictment.

1 5. Accordingly, the government requests that the
2 indictment in this case be resealed and that the indictment be
3 unsealed for defendant WEI and his counsel.

4 I declare under penalty of perjury that the foregoing is
5 true and correct to the best of my knowledge and belief.

6 DATED: September 29, 2008

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9 TERRI K. FLYNN
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